## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE - COLUMBIA DIVISION

KAREN MCNEIL, et al,	)
Plaintiffs.	) CASE NO.: 1:18-cv-00033
	) ) JUDGES CAMPBELL/FRENSLEY
VERSUS	) ) JURY DEMAND
COMMUNITY PROBATION SERVICES,	) JOKT BEMAND
LLC, et al,	)
Defendants.	

## MOTION FOR BRIEF EXTENSION OF TIME TO CONTINUE SETTLEMENT DISCUSSIONS

Come now Community Probation Services, LLC; Community Probation Services, L.L.C.; Community Probation Services; and Patricia McNair, by and through counsel, and move the Court to briefly extend the time for all responses to the Plaintiff's and County Defendants' Motion for Preliminary Approval of Class Settlement (Docket Entry 443) by one week. In support of this motion, these Defendants would state and show that the undersigned have been working with various counsel for all parties since prior to the filing of the Motion (443) to try and streamline the conclusion of this case, and specifically have continued working directly with the remaining co-Defendants, the PSI Defendants, to try and reach a resolution of ancillary matters, which if successful would streamline the complete end of this case and obviate the need for additional filings and disputes. Undersigned has also discussed with Plaintiffs the possibility of a judicial settlement conference with Judge Newbern to try and resolve remaining issues, to which Plaintiffs have recently agreed. Prior to asking to invoke the Court's blessing and Judge Newbern's time, however, the undersigned has been attempting to work the outstanding issues out directly with the various parties. The parties nearly had the loose ends resolved prior to the

filing of the Motion, but were unable to reach a final agreement due to no fault of these movants. Nevertheless, these movants desire to continue to work toward an end to this case. A one-week extension would be beneficial to try and resolve these loose ends to attempt to streamline the end of this case, and would not prejudice any parties in the slightest.

Undersigned called for Plaintiff's primary counsel this afternoon to obtain consent for this brief extension, but was unable to reach Plaintiff's counsel to discuss this motion or the ultimate resolution.

WHEREFORE premises considered, these Defendants move for a one-week extension for all responses, or to seek a judicial settlement conference with Judge Newbern to address the conclusion of the case.

Respectfully submitted,

MOORE, RADER, FITZPATRICK AND YORK, P. C.

By /s/ Daniel H. Rader IV, BPR 025998

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## By /s/ Randall A. York, BPR

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## CERTIFICATE OF SERVICE

The undersigned attorney herby certifies that on July 13, 2021, a true and exact copy of the foregoing pleading was filed electronically. Notice of this filing was sent by operation of the Courts electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties my access the filing through the Court's electronic filing system.

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with sufficient postage thereupon to carry same to its destinations.

This the 13th day of July, 2021.

MOORE, RADER, FITZPATRICK AND YORK, P. C.

By /s/ Daniel H. Rader IV BPR 025998

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